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October 22, 2021

File No. 50031.2179

**VIA ECF**

Hon. Victor Marrero  
United States District Court  
Southern District of New York  
500 Pearl Street, Suite 1610  
New York, NY 10007-1312

Re: *Rosenfield & Company, PLLC v. Trachtenberg, Rodes & Friedberg LLP et al.*  
1:21-cv-03858-VM

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Dear Judge Marrero:

We are counsel to third-party defendants Barry Friedberg and Leonard Rodes, as well as counsel to the defendant Trachtenberg Rodes & Friedberg LLP ("TRF Defendants").

We write on behalf of all the TRF Defendants to request a one-month extension of time, up to and including November 22, 2021, to respond to the amended third-party complaint and amended cross claims asserted by defendants Star Auto Sales of Bayside, Inc., Star Auto Sales of Queens, LLC, Star Hyundai LLC, Star Nissan, metro Chrysler Plymouth, Inc., Star Auto Sales of Queens County LLC, and Star Auto Sales of Queens Village LLC ("Star Defendants") (Dkt. No. 73). The TRF Defendants' deadline to respond to the amended third-party complaint and amended cross claims is currently October 22, 2021.

In accordance with the spirit of Your Honor's Individual Practices, we have contacted counsel for the Star Defendants concerning potential issues prevailing in the claims asserted against the TRF Defendants in the amended pleadings. Additional time is needed to prepare appropriate correspondence addressing these pleading issues and their legal foundation.

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We thank the Court for its attention to this matter.

Respectfully,

*/s/ Andrew Winters*

Andrew W. Winters, Esq. of  
LEWIS BRISBOIS BISGAARD & SMITH LLP

cc: All parties by ECF